

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____

v. : **DATE FILED:** _____

DARREN BROWN : **VIOLATIONS:**
: **18 U.S.C. § 641 (theft of public money - 18**
: **counts)**
: **18 U.S.C. § 1028(a)(7) (use of means of**
: **identification of another person to commit a**
: **federal crime - 16 counts)**
: **18 U.S.C. § 111(a)(1) and (b) (inflicting bodily**
: **injury while assaulting and resisting a federal**
: **officer - 1 count)**
: **18 U.S.C. § 2 (aiding and abetting)**

INDICTMENT

COUNTS ONE THROUGH EIGHTEEN

THE GRAND JURY CHARGES THAT:

1. The United States Postal Service is an agency of the United States whose activities include selling postal products, including stamps, to members of the public, at post offices and postal retail stores.

2. On or about the following dates, at the following locations in the Eastern District of Pennsylvania, defendant

DARREN BROWN

knowingly and willfully stole and converted to his own use, and knowingly and willfully aided and abetted the stealing and converting to his own use of, property of the United States, that is approximately \$,2997 worth of postal products, including stamps, through the passing of the

following stolen and forged CoreStates Bank checks, drawn on an account in a name with the initials “J.T.S.,” at the United States Postal Service:

<u>Count</u>	<u>Date</u>	<u>Check No.</u>	<u>Approximate Check Amount</u>	<u>Location</u>
1	4/27/04	1067	\$148	Philadelphia
2	4/27/04	1068	\$148	Philadelphia
3	4/28/04	1070	\$148	Philadelphia
4	4/28/04	1072	\$148	Philadelphia
5	4/30/04	1076	\$148	Philadelphia
6	4/30/04	1078	\$148	Philadelphia
7	5/3/04	1077	\$148	Havertown
8	5/3/04	1079	\$148	Upper Darby
9	5/3/04	1080	\$148	Philadelphia
10	5/6/04	1081	\$148	Philadelphia
11	5/7/04	1082	\$148	Philadelphia
12	5/7/04	1083	\$185	Darby
13	5/11/04	1084	\$148	Philadelphia
14	5/11/04	1085	\$185	Philadelphia
15	5/12/04	1086	\$222	Philadelphia
16	5/13/04	1087	\$222	Philadelphia
17	5/14/04	1090	\$185	Philadelphia
18	5/15/04	1091	\$222	Philadelphia

All in violation of Title 18, United States Code, Sections 641 and 2.

COUNTS NINETEEN THROUGH THIRTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about the following dates, at the following locations, in the Eastern District of Pennsylvania, defendant

DARREN BROWN

knowingly and without lawful authority used a means of identification of another person, that is, a name with the initials “J.S.,” as reflected on a false Pennsylvania driver’s license, with the intent to commit and to aid and abet the commission of violations of Title 18, United States Code, Sections 641 and 2, that is, the purchase of postal products, including stamps, at the United States Postal Service, with the following stolen and forged CoreStates Bank checks drawn on an account in a name with the initials “J.T.S.,” and thereby affected interstate commerce:

<u>Count</u>	<u>Date</u>	<u>Check No.</u>	<u>Approximate Check Amount</u>	<u>Location</u>
19	4/27/04	1067	\$148	Philadelphia
20	4/28/04	1070	\$148	Philadelphia
21	4/28/04	1072	\$148	Philadelphia
22	4/30/04	1076	\$148	Philadelphia
23	4/30/04	1078	\$148	Philadelphia
24	5/3/04	1077	\$148	Havertown
25	5/3/04	1079	\$148	Upper Darby
26	5/3/04	1080	\$148	Philadelphia
27	5/6/04	1081	\$148	Philadelphia
28	5/7/04	1082	\$148	Philadelphia

<u>Count</u>	<u>Date</u>	<u>Check No.</u>	<u>Approximate Check Amount</u>	<u>Location of Post Office</u>
29	5/7/04	1083	\$185	Darby
30	5/11/04	1084	\$148	Philadelphia
31	5/12/04	1086	\$222	Philadelphia
32	5/13/04	1087	\$222	Philadelphia
33	5/14/04	1090	\$185	Philadelphia
34	5/15/04	1091	\$222	Philadelphia

All in violation of Title 18, United States Code, Sections 1028(a)(7), (b)(1)(D) and (c)(3)(A).

COUNT THIRTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 15, 2004, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

DARREN BROWN

forcibly assaulted, resisted, opposed, impeded, intimidated, and interfered with an officer and
employee of an agency of the United States government, Postal Police Officer J.E., while Postal
Officer J.E. was engaged in, and on account of, the performance of his official duties, that is, by
among other things, physically pushing and striking him and resisting arrest, and in the
commssion of the acts described above, defendant BROWN inflicted bodily injury upon Officer
J.E.

In violation of Title 18, United States Code, Sections 111(a)(1) and (b).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney